



**COUNTY OF SANTA BARBARA
COUNTY EXECUTIVE OFFICE**

OFFICE OF EMERGENCY MANAGEMENT

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Chairman Ajit Pai
Federal Communications Commission
455 12 Street, SW
Washington, DC 20554

Re: Improvements Needed for the Integrated Public Alert & Warning System (IPAWS)

Mr. Chairman and Commissioners,

I am writing to you for the second time this year to help make you aware of a serious problem with the federal Integrated Public Alert & Warning System (or IPAWS). As you know, IPAWS includes two very important alerting tools, Wireless Emergency Alerts (WEA) and the Emergency Alert System (EAS). At present, these tools are problematic and unreliable in alerting and warning the public of hazards and threats. We ask that you take immediate action to improve this critical system.

Santa Barbara County recently faced a catastrophic wildfire, flooding and debris flows that resulted in the deaths of 23 of our residents, damaged or destroyed 529 structures, and led to over 421 million dollars in insurance claims being filed. The disasters also damaged public and private property, the environment, and critical infrastructure. During these events, we relied on an array of communication tools to alert the public of these and other hazards. And while we continue to use these tools, unfortunately, due to the flaws and technical limitations that currently plague WEA and EAS, we cannot fully depend on them to deliver timely, accurate and targeted information to the public so that they can take steps to keep themselves safe.

Problems with the WEA and EAS systems are not limited to Santa Barbara County. These are nationwide problems that could have deadly-serious consequences if deliberate action to fix the IPAWS system is not taken. Currently, WEA is limited to no more than 90 characters which forces the alerting agency to have to abbreviate an emergency alert to such a degree that it often results in an unclear message that causes confusion among the public. It also sends the message far beyond the area targeted (in many cases, sending the alert to the entire county as well as the population of neighboring counties), which creates unnecessary fear for people in unaffected areas. This has resulted in a large number of panicked people calling 9-1-1, thereby inundating emergency dispatch centers and public safety agencies with calls that clog up the 9-1-1 system for hours.

In addition, the WEA system does not allow for alerting in languages other than English, which is very problematic as a large percentage of our residents are non-English speaking. Compounding this problem is IPAWS' lack of multi-media capability. There are the over 20 unwritten dialects used by residents in our county and an estimated 40% of the population has a disability, access or functional need. Without multimedia capability that allows for content such as images and instructional infographics, we simply cannot communicate effectively with these and other particularly vulnerable segments of the population.

To make matters worse, the EAS portion of the system has little to no state and federal oversight and relies on the *voluntary* cooperation of broadcasters, cable and satellite providers who are often working with incompatible equipment and have no incentive in making this program a success. This unfortunate reality complicates an already difficult process and adds multiple points of weakness into the system. Like WEA, EAS has had numerous failures in real-world events here and nationwide.

In conclusion, immediate action needs to be taken to improve WEA and EAS to make it a reliable fully functional system that can deliver an alert and warning successfully to a targeted community every time it is used. Our citizens' lives depend on it. We are prepared to partner with you.

Thank you for your time and consideration.

A handwritten signature in blue ink, appearing to read 'R. Lewin', with a long horizontal flourish extending to the right.

Robert Lewin, Director

CC: Mona Miyasato, CEO
Salud Carbajal, U.S. Congressman